

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Bankruptcy No. 19-24789
)	
KEVIN DAVID TOLEJKO,)	
)	Chapter 13
Debtors,)	
)	
)	
)	
KEVIN DAVID TOLEJKO,)	
)	
Movants,)	
)	
v.)	
)	
RONDA J. WINNECOUR,)	
CHAPTER 13 TRUSTEE,)	
)	
Respondent.)	

**DECLARATION CERTIFYING THE DEBTORS EXISTING CHAPTER 13 PLAN IS
SUFFICIENT TO PAY THE NEW MORTGAGE AMOUNT**

Movants, by their attorney, Joseph P. Nigro, Esquire, and Nigro and Associates, LLC, hereby files this Declaration and avers the following:

1. NewRez LLC dba Shellpoint Mortgage Servicing filed a Notice of Mortgage Payment Change for a mortgage amount change to \$1,933.09.

2. Debtors Chapter 13 Plan pays NewRez LLC dba Shellpoint Mortgage Servicing \$2,092.46 for the mortgage payment.

3. Therefore, since the new mortgage amount is \$1,933.09 and this amount is less than the amount currently under the Plan in the amount of \$2,092.46, no amendment is required to the Chapter 13 Plan.

Respectfully submitted,

12/13/2022
Date

/s/ Joseph P. Nigro
JOSEPH P. NIGRO, ESQUIRE
PA I.D. NO. 47810
Attorney for Movant
NIGRO & ASSOCIATES, LLC
1330 Old Freeport Road, Suite 3BF
Pittsburgh, PA 15238
(412) 471-8118

nigroassociateslaw@gmail.com